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22 *Counsel for Defendant Google LLC*

23 **UNITED STATES DISTRICT COURT**

24 **NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION**

25 CHASOM BROWN, *et.al*, individually and  
26 on behalf of all similarly situated,

27 Plaintiffs,

v.

28 GOOGLE LLC,  
Defendant.

Case No. 4:20-cv-03664-YGR-SVK

**SUPPLEMENTAL DECLARATION OF  
STEPHEN A. BROOME IN SUPPORT OF  
GOOGLE, LLC'S MOTION FOR  
SUMMARY JUDGMENT**

Hon. Yvonne Gonzalez Rogers  
Courtroom: 1 – 4th Floor  
Date: May 12, 2023  
Time: 1:00 p.m.

1 I, Stephen A. Broome, declare as follows:

2 1. I am a partner with the law firm of Quinn Emanuel Urquhart & Sullivan, LLP,  
3 counsel for Defendant Google LLC in this matter. I am an attorney at law duly licensed to practice  
4 before all courts of the State of California and admitted to practice in the Northern District of  
5 California by this Court. I have personal knowledge of the matters set forth herein and am  
6 competent to testify.

7 2. Attached as **Exhibit 146** is a true and correct copy of the Declaration of Konstantinos  
8 Psounis, dated November 30, 2022.

9 3. Attached as **Exhibit 147** is a true and correct copy of the Declaration of Konstantinos  
10 Psounis, dated February 10, 2023.

11 4. Attached as **Exhibit 148** is a true and correct copy of excerpts from the transcript of  
12 the deposition of Glenn Berntson, taken on February 14, 2023.

13 5. Attached as **Exhibit 149** is a true and correct copy of excerpts from the transcript of  
14 the April 29, 2021 Discovery Hearing.

15 6. Attached as **Exhibit 150** is a true and correct copy of excerpts from the transcript of  
16 the deposition of Adrienne Porter Felt, taken on November 16, 2021.

17 7. Attached as **Exhibit 151** is a true and correct copy of excerpts from the transcript of  
18 the deposition of Abdelkarim Mardini, taken on November 24 2021.

19 8. Attached as **Exhibit 152** is a true and correct copy of excerpts from the transcript of  
20 the deposition of Christopher Palmer, taken on January 5, 2022.

21 9. Attached as **Exhibit 153** is a true and correct copy of excerpts from the transcript of  
22 the deposition of Gregory Fair, taken on December 14, 2021.

23 10. Attached as **Exhibit 154** is a true and correct copy of excerpts from the transcript of  
24 the deposition of Sabine Borsay, taken on June 30, 2022.

25 11. Attached as **Exhibit 155** is a true and correct copy of excerpts from the transcript of  
26 the deposition of Ramin Halavati, taken on January 18, 2022.

27 12. Attached as **Exhibit 156** is a true and correct copy of the Expert Report of Bruce A.  
28 Strombom, dated May 27, 2022.

1       13.       Attached as **Exhibit 157** is a true and correct copy of excerpts from the transcript of  
2 the deposition of Jonathan Hochman, taken on July 21, 2022.  
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5       I declare under penalty of perjury of the laws of the United States that the foregoing is true  
6 and correct. Executed in Los Angeles, California on April 26, 2023.  
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9       By */s/ Stephen A. Broome*  
10       Stephen A. Broome  
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